



SHERWIN-WILLIAMS®

THE SHERWIN-WILLIAMS COMPANY
Environmental, Health & Regulatory Services
101 Prospect Avenue NW
Cleveland, Ohio 44115-1075
Facsimile: (216) 566-2730

April 29, 2009

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Response to EPA Letter dated March 25, 2009
The Sherwin-Williams Company (February 18, 2009) Response to EPA Letter dated January 14, 2009 EPA's Comments on the *"Revised" Route 561 Dump Site Ground Water Contour Maps* (dated August 29, 2008)

The Sherwin-Williams Company Sites – RI/FS Activities
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035

Dear Mr. Klimcsak:

The Sherwin-Williams Company (Sherwin-Williams) has prepared this reply in response to the U.S. Environmental Protection Agency (EPA) letter dated March 25, 2009 regarding The Sherwin-Williams Company (February 18, 2009) Response to EPA Letter dated January 14, 2009 EPA's Comments on the *"Revised" Route 561 Dump Site Ground Water Contour Maps* (submitted August 29, 2008).

Presently, there are three shallow wells located within the Dump Site fenced area that were installed during the RI activities conducted in July 2005. As discussed during the December 18, 2008 Gibbsboro project meeting, EPA is recommending 11 new wells be installed to supplement the three existing shallow wells.

These 11 wells are comprised of four well couplets, two deep wells and one shallow well. The four well couplets are proposed at three off-site locations in addition to one location within the Dump Site. The two deep wells are intended to be co-located at existing shallow well locations (DMMW0001 and 0003) to form couplets. There is one shallow well proposed within the fenced area near the northeastern fence line adjacent to Clement Lake. These locations are presented on the attached Figure 1.

On March 25, 2009, Ray Klimcsak (EPA) along with Patrick Austin and Arthur Fischer (both Weston Solutions, Inc. [Weston®]) inspected the proposed locations that Weston and the drilling subcontractor (ECDI) marked out the previous week. Due to accessibility issues, there were three locations identified that would require the proposed monitor well locations to be shifted. They are as follows:

- Due to the proximity of underground and overhead utilities, it is suggested that the proposed well cluster on Marlton Avenue be shifted approximately 30 feet from the south side of the street to the north side of the street.
- Due to the proximity of a large tree, the proposed well cluster next to the Medical Arts Building (across Route 561 from the Dump Site) will need to be shifted approximately 10 to 20 feet in a northeasterly direction towards Route 561.
- Due to its location in an inaccessible area of the wetlands (soft, wet soils), it is suggested that the proposed well cluster in the middle of the site (near the base of the slope where the culvert from the Wawa parking lot runs) be shifted upslope approximately 50 feet to a more accessible, stable area.

As a result of this site walk, EPA concurred with the re-location of the well clusters located on Marlton Avenue and next to the Medical Arts Building. However, in lieu of the monitoring well cluster in the middle of the site (near the intermittent stream), EPA is requesting that three or four pore water samples be collected along the intermittent stream. These revised monitor well and pore water locations are presented on the attached Figure 2.

Sherwin-Williams is in the process of obtaining access from the impacted property owners and is prepared to start drilling activities for the wells located within the Dump Site as soon as access is confirmed. At the present time, the driller is tentatively scheduled for the week of May 18, 2009. A proposed schedule for the monitoring well installation activities at the Dump Site is attached as Figure 3.

Should you have any questions or comments regarding this response, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,

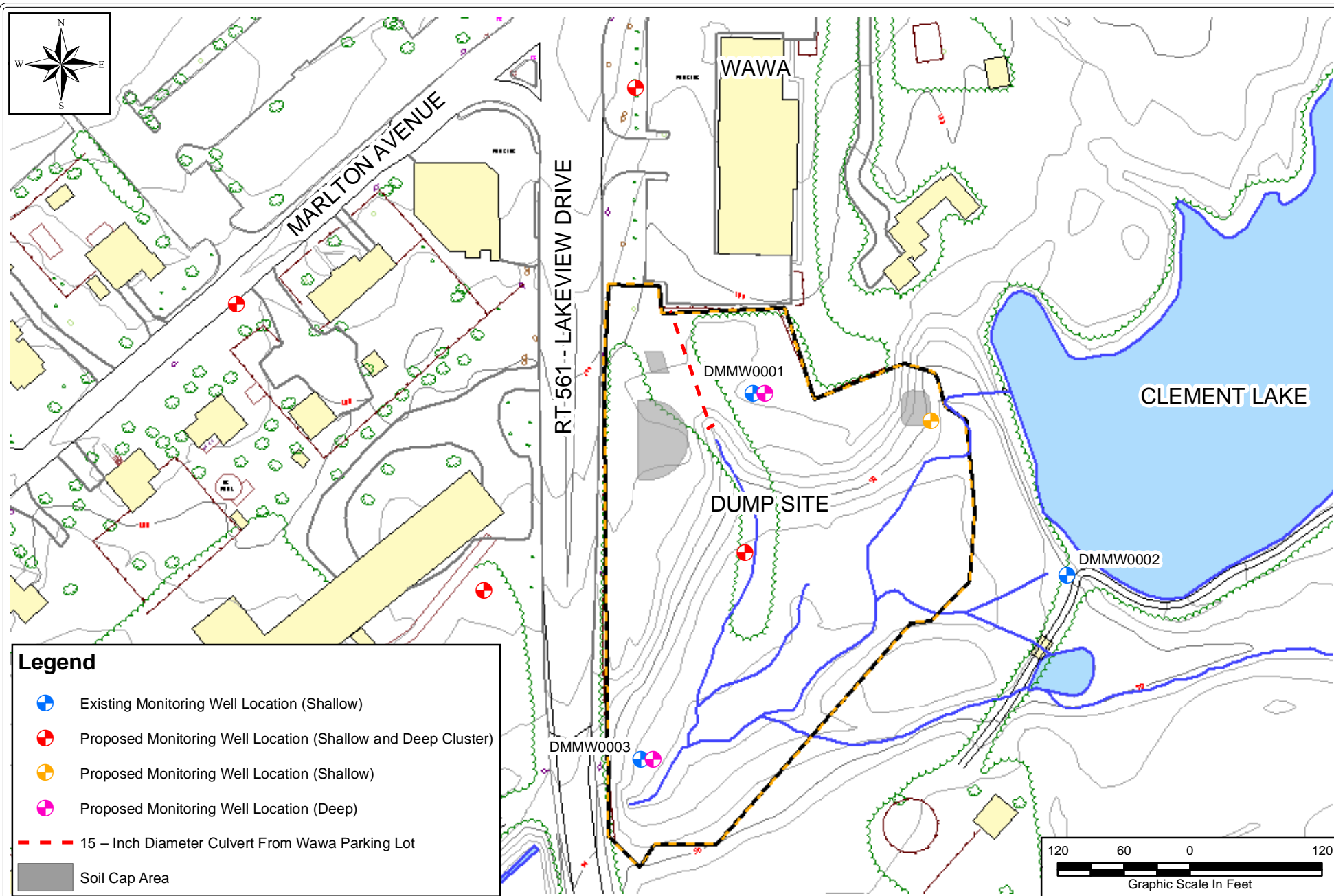


Mary Lou Capichioni
Director Remediation Services

Attachment

cc: J. Josephson, USEPA
J. Doyon, NJDEP
H. Martin, ELM
S. Jones, Weston

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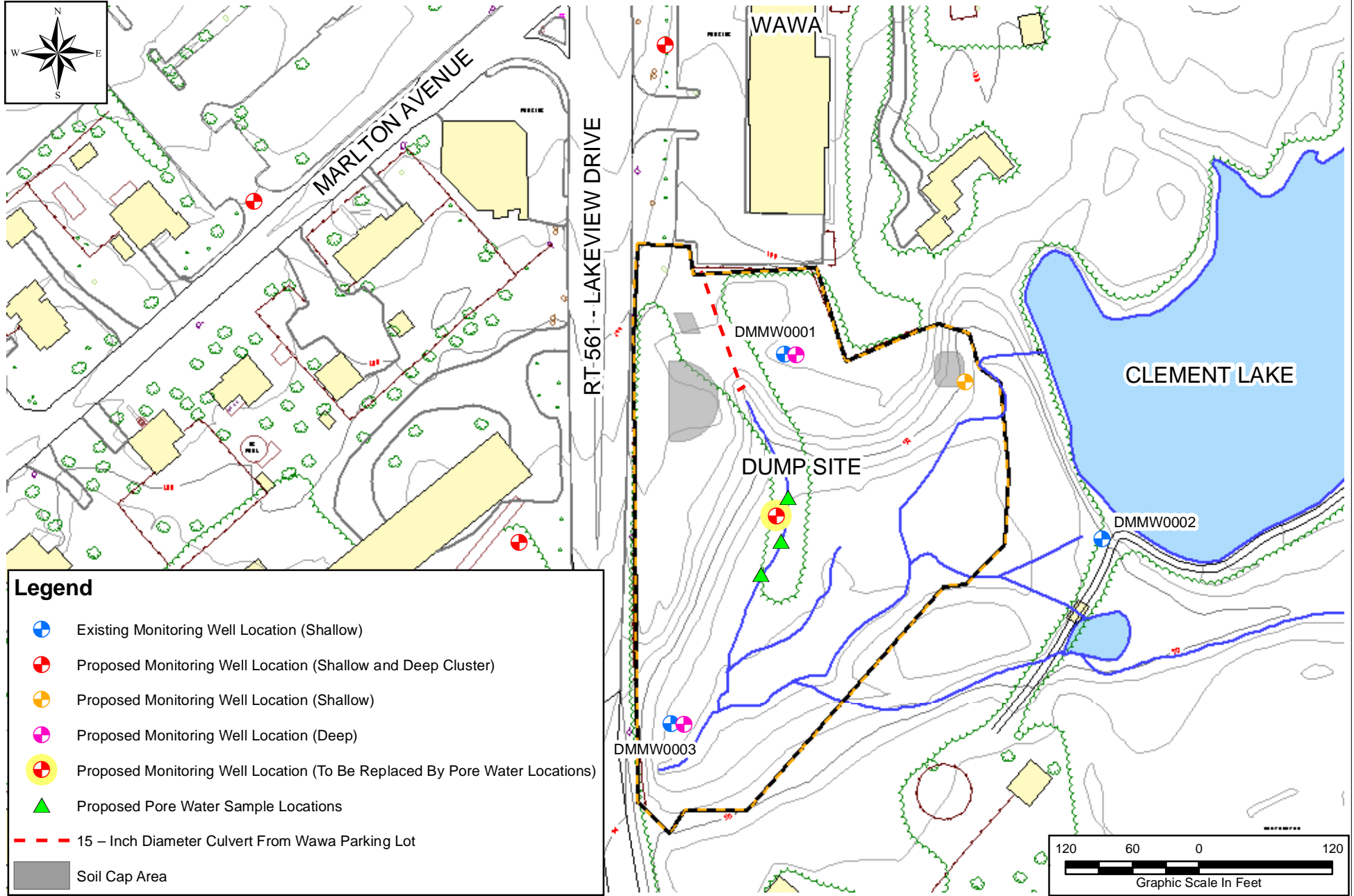
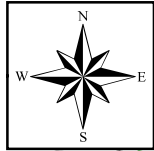
DATE: April 2009

FIGURE #: 1

PROJECT: Sherwin-Williams Gibbsboro Remedial Investigation

CLIENT NAME: The Sherwin-Williams Company

TITLE: Dump Site
Proposed Monitoring Well Location Map
(January 14, 2009 EPA Comment Letter)



Legend

- Existing Monitoring Well Location (Shallow)
- Proposed Monitoring Well Location (Shallow and Deep Cluster)
- Proposed Monitoring Well Location (Shallow)
- Proposed Monitoring Well Location (Deep)
- Proposed Monitoring Well Location (To Be Replaced By Pore Water Locations)
- Proposed Pore Water Sample Locations
- 15 - Inch Diameter Culvert From Wawa Parking Lot
- Soil Cap Area



DATE: April 2009

FIGURE #: 2

PROJECT: Sherwin-Williams Gibbsboro Remedial Investigation

CLIENT NAME: The Sherwin-Williams Company

TITLE: Dump Site
Revised Proposed Monitoring Well Location Map
With Pore Water Locations
(March 25, 2009 EPA Comment Letter)

FIGURE 3
Dump Site Monitor Well Installation Schedule
The Sherwin-Williams Company
Gibbsboro, NJ

ID	Task Name	Duration	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10
			SMTWTFSS	SMTWTFSS	SMTWTFSS	SMTWTFSS	SMTWTFSS	SMTWTFSS	SMTWTFSS	SMTWTFSS	SMTWTFSS	SMTWTFSS
1	Access Received/Mobilization and Coordination Activities	4 days	[Bar]									
2	Screening, Logging, and Sampling Activities	4 days		[Bar]								
3	Well Installation Activities	10 days			[Thick Bar]							
4	Dump Site Wells (Shallow Well By Clement Lake, Deep Wells at MWs 1&3)	4 days			[Bar]							
5	Wawa (1 Shallow/Deep Cluster)	2 days				[Bar]						
6	Across the Street From Sherwood Fence (1 Shallow/Deep Cluster)	2 days					[Bar]					
7	Medical Arts Building (1 Shallow/Deep Cluster)	2 days						[Bar]				
8	Monitoring Well Development Activities	6 days					[Bar]					
9	Monitoring Well Stabilization Period Prior to Groundwater Sampling	8 days							[Bar]			
10	Monitoring Well and Pore Water Sampling Activities	6 days									[Bar]	

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